

EXHIBIT K(2)



Garcia - VWGoA Counterproposals

Friday, November 13, 2020

Custodians

Anderson, Jerohn; Ashton, Michael; Chen, Chi-Han; Gillies, Mark; Glynn, Carrie; Glynn, Timothy; Hathaway, Jed; Holtz, David; MacKnight, Andrew; Martell, Robert; McCarthy, Robert; McReynolds, Gregory; Reel, Bryan; Sandvig, Christopher; Slatton, Steven; Stowe, Patrick; Vazin, Scott; Wolyniec De Freitas, Ana

Relevant Time Period

1/1/2007 to 3/21/2019

Total Number of Hits: 82,481**Total Number of Hits + Family: 177,234**

VWGoA Search Strings - Counterproposals	Search String #	Hits	Unique Hits
"Ricardo Garcia" OR "Duane Glover" OR "Paul Jacobson" OR "Gaetano Calise" OR "Mykhaylo Holovatyuk" OR "Brian Garcia" OR "Paul Thomson" OR "David Hartman" OR "Dave Hartman" OR WVWLF7AU2FW135993 OR WVGBV7AX1DW558422 OR WVWAP7AN6FE817987 OR WVWGU7AN3DE556558 OR WVWBN7AN3DE507979 OR 3VW4T7AU7HM001719 OR 3VW017AU4HM500479 OR WVGE9BP1ED001525	1	5,018	794
1,541 VINs listed in Exhibit A to VWGoA's supplemental interrogatory responses	2	55,696	50,192
(To/From/CC/BCC: @dot.gov OR @justiz.niedersachsen.de) AND 18V329 OR 18-V-329 OR 18V-329 OR 18-V329 OR 19V679 OR 19-V-679 OR 19V-679 OR 19-V679 OR 01C5 OR 01C6 OR 01D7 OR 0-series or 0series or "0 series" or "zero series" or zero-series or pre-series or preseries or "pre series" or preproduction or "pre production" or pre-production or "early production"	3	29	3
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND (18V329 OR 18-V-329 OR 18V-329 OR 18-V329 OR 19V679 OR 19-V-679 OR 19V-679 OR 19-V679 OR 01C5 OR 01C6 OR 01D7)	4	1,337	305
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND (Odometer OR mileage OR (default* w/10 mileage) OR (10 w/10 mile) OR (ten w/10 mile) OR "10 mile" OR "10 miles" OR (mileage w/5 10) OR (mileage w/5 ten)) AND (title w/5 application)	5	1,064	440
(preproduction OR pre-production OR "pre production" OR preseries OR pre-series OR "pre series" OR zero-series OR "zero series" OR 0-series OR 0series OR "0 series" OR "early production") AND ((("audit report" OR "Der Spiegel" OR "PR Number" OR "Option code" OR "ECR" OR "ECN" OR "engineering change order" OR "engineering change notice" OR "engineering change request" OR "Elektronischer Teilekatalog" OR ETKA) OR ((comply* OR compliance OR confirm* OR conform* OR meet OR test*) w/10 ("Federal Motor Vehicle Safety Standards" OR "FMVSS")))	6	3,596	2,657
(To/From/CC/BCC @carfax.com) AND contract OR Agreement	7	99	99
(To/From/CC/BCC: @vw.com OR @volkswagen.de OR @vw.com.mx) AND "Carfax price calculator"	8	0	0
Carfax AND ((Certificate w/10 "buyback guarantee") OR "daily data" OR "data feed")	9	179	169
(Certificate w/5 alter*) OR (alter* or modif* or retrofit* w/10 (manufactur* w/5 (post* OR after)))	10	207	106
("Conformity of Production" or COP) AND w/20 ("Process Standard" or "Quarterly Report" or "Annual Report")	11_1	397	364
("Conformity of Production" or COP) AND w/20 (((CQ-A or QS or EKSP or CQ-P) AND (non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping)))	11_2	132	99
("Conformity of Production" or COP) AND w/20 (60055 or 4889600 or E-tag or Etag or PARS or "Project Appropriation Request" or "Project Appropriation Request" or "sold retail" or (retail w/5 sale) or VCI or "VW Credit" or auction or "auction system")	11_3	118	98

("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS) AND w/20 (noncompliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping)	11_4	4,105	3,529
(0-series or Oseries or "0 series" or "zero series" or "zero-series" or pre-series or preseries or "pre series" or preproduction or "pre production" or pre-production or "early production") AND w/20 ("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS)	11_5	78	7
(0-series or Oseries or "zero series" or zero-series or pre-series or preseries or "pre series" or preproduction or "pre production" or "early production") AND w/20 (non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping or "internal use only")	11_6	2,448	1,880
("Certificate of Title" or "original title" or "title application" or appl* w/5 title) AND w/20 ((7,500 or 7500) or preregistration or VCI or "VW Credit" or auction or "auction system" or CPO or "certified pre-owned" or "certified pre owned")	11_7	1,316	1,060
(Odometer or miles or mileage) AND w/20 (inaccurate or "not accurate" or non-compliance or noncompliance or "out of compliance" or noncompliant or "not compliant" or "non compliant" or "non-compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or false or perjury or jail or prison or truth or truthful)	11_8	6,438	1,344
((sales w/3 (strategy* OR plan OR project*)) OR "market share" OR profitability) AND w/20 ("certified preowned" OR "certified pre owned" OR "certified pre-owned" OR CPO)	12	2,200	2,186
((certificat* w/5 manufacturer*) OR (certificat* w/5 alter*) OR MCO) AND w/20 (affix* OR issu* OR issuance OR complete OR appl*)	13	2,442	2,128
("Federal Safety Standards" or FSS or "Federal Motor Vehicle Safety Standards" or FMVSS) AND ("591.5" or "591.7" or "re-exported" or destroyed or donated or retro*)	14	N/A	
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype) AND ("591.5" or "591.7" or "re-exported" or destroyed or donated)	15	N/A	
("imported solely for the purpose of research, investigations, demonstrations or training, or competitive racing")	16	N/A	
((modif* w/5 vehicle*) and Puebla)	17	N/A	
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND (retro* or modif*) AND (document* or record*)	18	N/A	
(noncompliance or "non-compliance" or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable" or scrap or scrapped or scrapping) AND (retro* or modif*) AND (document* or record*)	19	N/A	
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND w/20 (audit or "17,000" or 17000 or "9,063" or 9063)	20	1,464	1,274
("0-series" or "Oseries" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series production") AND ("Der Spiegel" or "https://www.spiegel.de**")	21	979	567
(mole or informant or whistleblower or rat or snitch*) AND ("Der Spiegel" or "https://www.spiegel.de**")	22	241	68
"price calculator" AND Carfax AND (profit* or reven* or sale* or residual)	23	10	10
To/from/cc with @carfax.com domain name AND "price calculator" AND (profit* or reven* or sale* or residual)	24	N/A	
importer w/3 code w/3 922	25	N/A	
(Bid* w/5 change*) AND (922 or 499 or 444 or CP8)			

To/From/ CC "tim.glynn@vw.com" AND (noncompliance or "non-compliance" or "out of compliance" or noncompliant or "not compliant" or "do not comply" or "does not comply" or illegal or improper or "cannot be certified" or "saleable with limitations" or "not saleable") or AND (scrap or scrapped or scrapping or exported or "re-exported" or destroyed or donated or retro*))	26	436	391
(To/From/ CC "Chi-Han.Chen@vw.com") AND ("0-series" or "0series" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or CP8) w/20 (sal* or sell*)	27	334	256
S7Q or S99 or SAQ or SJO	28	N/A	
"20V-561" or 20V561 or 01E9	29	N/A	
"caution: preproduction model"	30	0	0
"vehicle contains special equipment/fixtures that are not documented in the genuine parts catalogue"	31	22	0
(increase* w/3 risk) AND (crash or fire or injury) AND (18V329 OR "18-V-329" OR "18V-329" OR "18-V329" OR 19V679 OR "19-V-679" OR "19V-679" OR "19-V679" OR 01C5 OR 01C6 OR 01D7 OR 01E9 OR "20V-561" OR 20V561)	32	166	0
("0-series" or "0series" or "0 series" or "zero series" or "zero-series" or "pre-series" or preseries or "pre series" or preproduction or "pre production" or "pre-production" or "early production" or prototype or "series-production") AND w/20 ((crash w/3 rating) or (crash w/3 worth*) or (safety w/3 impact*) or iihs or "iihs.org" or "Insurance Institute for Highway Safety")	33	60	43
(fals* or inaccurate or mislead*) w/20 (mile* or odometer or (title w/5 application) or (use w/5 history))	34	5,713	745
(file w/4 feed) AND Carfax	35	16	12